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May 23, 2019

Honorable Jesse M. Furman, U.S.D.J.
United States District Court, Southern District of New York
40 Centre Street, Room 2202
New York, New York 10007

Re: *John Curtis Rice v. NBCUniversal Media, LLC*, No. 19 Civ. 447 (JMF)

Dear Judge Furman:

We write on behalf of NBCUniversal Media, LLC (“NBCUniversal”), defendant in the above-captioned action. In his reply Mr. Liebowitz has noted the absence of specific time records detailing the time spent in the various outlined tasks. We believe that the declaration submitted sufficiently outlines the nature of the tasks and time expended thereon. However, counsel would be happy to submit a breakdown in table form such as the example provided by Mr. Liebowitz, or, subject to any relevant privilege considerations, the time records themselves should the court wish.

Respectfully submitted,

/s/mark lerner

Mark Lerner

cc: Richard Liebowitz, Esq. (by email and ECF)